

## **APPENDIX H. ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS**

### **Eliminated Sub-Alternative 1**

Establish a temporary red snapper annual catch limit (ACL) ACL of 19,600 fish for 2012. Establish a temporary red snapper commercial ACL of 5,502 fish or 31,226 lbs gutted weight for 2012. Establish a temporary red snapper recreational ACL of 14,098 fish for 2012. The sector ACLs were calculated through use of the established allocations for red snapper (28.07% commercial; 71.93% recreational).

Reason for elimination: The method for estimating the ACL of 19,600 fish uses the average mortalities from 2010 and 2011 to calculate the 2012 discard mortalities. This method and resulting ACLs were presented to the South Atlantic Fishery Management Council (South Atlantic Council) at their June 2012 meeting. The analysis is included in **Appendix C** to this environmental assessment. The South Atlantic Council discussed establishing the ACL based on this method, but did not forward this ACL in their request for emergency regulations (**Appendix G**) as the Director of the Southeast Fishery Science Center expressed concerns with the assumptions used in the methodology to determine the ACL of 19,600 fish for 2012.

NOAA Fisheries Service did not evaluate this alternative in detail in this EA due to the unreasonable assumptions discussed at the South Atlantic Council meeting. Setting the ACL equal to 19,600 fish is contingent on fishing effort continuing to decrease as stock abundance increases. Review of preliminary recreational fishing effort data from the Marine Recreational Information Program indicates effort during waves 1-2, 2012, was higher than 2010 and 2011, but lower than effort observed in the previous 20 years.

Given that preliminary data indicates effort did not further decrease, it is unreasonable to assume dead discards will remain similar to 2010-2011 average levels (**Appendix C**).

Dead discard estimates for waves 1-2, 2012, are comparable or slightly higher than dead discards observed in 2011. The South Atlantic Council's preferred ACL accounts for increases in stock abundance, which is expected to increase encounter rates, resulting in higher dead discards and a lower ACL for landed red snapper.

An excerpt of the minutes of the June 2012 Snapper-Grouper Committee Meeting are included below:

MR. HAYMANS: Well, I was going to ask it of Bonnie because Roy indicated when I brought up a similar question up earlier that the center didn't necessarily care for the average mortalities from 2010 and 2011, and I was going to ask Bonnie to elaborate on that and why we didn't choose the 19.

DR. PONWITH: Again, as our chairman mentioned, this is relevant if and only if the council comes up with a way – makes a determination that they want a reopening in 2012 and comes up with a way to actually be able to accomplish it, then this conversation is

highly relevant. If you take a look at this slide and then you also take a look – just to refresh our memories, let's go back to Slide Number 4. What you see on that slide, on the right-hand side are the projections for red snapper discard mortality. Those projections were based on the SEDAR 24 stock assessment, and you see that it starts to increase and that increase again is a function of the fact that there are more red snapper out there because that is the intent of the management measure, to make more red snapper out there. That means that your encounter rates would be expected to go up as well. On the left-hand what we have is the number in that projection compared to the actual estimate of discards that were done when we looked at the commercial logbook, the MRFSS and the headboat survey. What you see in 2010 is a projected estimate of 65,000 and an estimated bycatch of 71,000, so we actually caught more fish than we projected we were going to catch so we have an overrun. In 2011 we projected that we would encounter 64,000 dead discards, and the mortalities that were actually estimated based on the data that we had were 61, which was below, so we have one year we were above and one year we were below. In 2012 what is going to happen; we don't really know because we're in the middle of the year and there is no way to actually do an estimate in the middle of the year as Andy's presentation gave. Now let's go back to that other table that we had up, which is Slide Number 6. If you take a look at this, in 2011 and 2010 one proposal was just average those and say that might be what we're going to catch. That mathematically is a way to do it, but logically it doesn't make much sense, and the reason is we expect red snapper to be increasing; it's not logical to think that the population would be increasing in the ocean and we would have static encounter rates. I'm troubled by that one because it is just not logical. The next one is that you average 2010 and 2011 as sort of what happened in those two years, those differences, and then average in on top of that what the projection is for 2012. What that does is it decreases 2012 by some amount that would be logical from the standpoint of we're seeing some trends in effort and those trends appear to be declining. If effort is declining, it could counterbalance some of the increases that we're seeing in the abundance. The third example here, it increases by the change in the exploitable abundance but it also makes a correction for the decrease in fishing effort in the patterns that we're seeing in those two years, 2010 and 2011. Then the last one, the smallest one, it just makes the change – help me out with that one, Andy.

MR. STRELCHECK: The last one is similar to the one above it except it is not altering the estimates based on the decrease in effort, so it is essentially presuming effort will remain constant, but the exploitable abundance will increase.

DR. PONWITH: So those are sort of a range of scenarios and there is no concrete way to say that this one is the truth, it is the one that is going to happen. There is an explanation for each of them and some of those explanations are more plausible or more reasonable than others. It is a matter of looking at that range and deciding what your goals are in terms of managing for risk of disrupting your rebuilding plan weighed with your risk of foregoing a potential fishing opportunity, so those are the two risks you're weighing. You need to make a determination based on that information of which of these scenarios you would select. From the science center's perspective, for me that top one with averaging just 2010 to 2011 is not a viable option. It would be hard for me to justify that one scientifically.